

## **KENTUCKY DEPARTMENT OF EDUCATION**

### **STAFF NOTE**

#### **Action/Discussion Item:**

Request from the Jefferson County Board of Education for a waiver of specific requirements relative to the district leadership assessment outlined in 703 KAR 5:180

#### **Applicable Statute or Regulation:**

KRS 156.160, KRS 160.346, 703 KAR 5:180.

#### **Action Question:**

Should the Kentucky Board of Education (KBE) approve Jefferson County's request for waiver of specific requirements relative to the district leadership assessment outlined in 703 KAR 5:180?

#### **History/Background:**

***Existing Policy.*** KRS 156.160 (2) allows a local board of education to request in writing that the KBE waive any administrative regulation promulgated by the board provided certain criteria are met. KRS 160.346 authorizes the KBE to promulgate regulations to establish processes and procedures for implementing interventions required of persistently low-achieving schools and districts. 703 KAR 5:180 establishes those processes. One of the requirements is the conducting of a district leadership audit to determine the functioning of school and district governance structures and the capacity of leadership to lead the required interventions. While the KBE may waive the specific type of audit process required in 703 KAR 5:180, it cannot waive the establishment and make-up of the audit team that is required by statute (KRS 158.6455(4)).

Because it has schools that have been identified as persistently low-achieving, Jefferson County Public Schools (JCPS) is required to undergo a district leadership assessment. Unrelated to this process, JCPS recently contracted with Phi Delta Kappa, the professional organization for educators, to conduct a curriculum management audit. The curriculum management audit is an intensive, third-party examination of the curriculum design and delivery system of a school or school district. Curriculum policy and the system in which the curriculum functions are both analyzed by the audit team, using documents, interviews, and site visits as major sources of data to determine the extent to which there is congruence among the written, taught, and tested curricula. The report provides specific recommendations to improve those functions.

JCPS' curriculum management audit report has been completed very recently. The site visit required extensive preparation, staff time and disruption to students, but resulted in an exhaustive evaluation of instructional policy and practice. State leadership assessment requirements mirror those of the audit, so if the district is required to complete a second full-blown assessment process, there is the potential to negatively impact student learning.

To that end, Jefferson County is requesting to be allowed to substitute the audit process required by 703 KAR 5:180 with a crosswalk of the Phi Delta Kappa curriculum management audit, the AdvancEd Diagnostic Review Standards and the Standards and Indicators for School Improvement. An audit team would still be selected to perform a crosswalk of these systems to generate the findings and conclusions for the leadership assessment report, with additional data being collected by the team as necessary to fill any gaps not covered in the curriculum audit. Allowing this substitution would accomplish the same objectives as the full-blown leadership assessment, but with far less disruption to classroom instruction.

**Staff Recommendation and Rationale:**

Based on the issues addressed above, staff recommends KBE approval of the requested waiver. Since the recent Phi Delta Kappa curriculum audit requirements align with those of the state leadership assessment, that audit can serve as the basis to generate the findings and conclusions for the leadership assessment report and prevent further disruption to student learning.

**Impact on Getting to Proficiency:**

Allowing Jefferson County to substitute a crosswalk of the Phi Delta Kappa curriculum management audit, the AdvancEd Diagnostic Review standards and the Standards and Indicators for School Improvement for the traditional district leadership assessment process will allow more staff time and energy to be addressed to student learning needs and will mean less interruption of the instructional process.

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**Commissioner of Education**

**Date:**

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